



Special Education Advisory Committee Policy Subcommittee

Budget Concerns and Recommendations Summary

January 31, 2022

Prepared For:
SEAC Membership
Special Education Community Loudoun County School Board

Summary of Concerns and Recommendations

Concern 1: Teachers and assistants who provide direct services to students are being cut while indirect positions are protected.

Concern 2: The Specialized Instructional Facilitator (SIF) staffing model does not meet the needs of our students or teachers.

(Responsive to staff's FY23 initiative 5)

Concern 3: The proposed budget does not provide sufficient supports for mental health, especially behavior.

(Responsive to staff's FY23 initiative 1)

Concern 4: The proposed budget does not provide staffing necessary to implement meaningful inclusion goals.

(Responsive to staff's FY23 initiatives 2 and 9)

Recommendation 1: Reallocate (15.0FTE) SIF-B from the Special Education budget to 19.0FTE Licensed Behavior Analyst (LBA) under the Director of Student Mental Health. (Responsive to concerns 1-3, staff's FY23 initiatives 1 and 2)

Reference:

Director, Student Mental Health is proposed on page numbered 205 / PDF page 215.

Recommendation 2: Reallocate (5.0FTE) SIFs from the Special Education budget to 5.0FTE Specialist: Inclusive Instructional Designer.

(Responsive to concerns 2 and 4, staff's FY23 initiative 2 and 9)

Reference:

SPED budget main page is page numbered 216 / PDF page 226.

SPED budget proposed change details on page numbered 218 / PDF page 228.

Future Work: SEAC, the school board, and staff need to review the staff positions and structure and realign them to meet our strategic goals. (Responsive to all)

1. Concerns

Concern 1: Teachers and assistants who provide direct services to students are being cut while indirect positions are protected.

Prior to the current pandemic circumstances, SEAC was concerned that the Department of Special Education had become inefficient, with an excess of indirect staff (administrators, supervisors, deans, specialists, facilitators, coordinators, etc.). For years, the staff's proposed solutions to most SPED problems involved adding more indirect staff.

SEAC and the School Board have received numerous reports that teachers and aides are working harder than ever due to the current pandemic circumstances. Mid-year resignations and retirements as well as illness and quarantine has led to a severe shortage of direct instructors in our schools. We all greatly appreciate the efforts of those staff who directly serve our students.

SEAC has received numerous reports of **major** cuts to IEP services during the pandemic as well as failure to implement IEP services.

SEAC has received numerous reports of students who have not made educational progress since March of 2020 and who have significantly regressed due to the lack of appropriate supports. The staff has presented data to the school board showing that learning loss continues to severely and disproportionately impact SPED students.

SEAC is concerned that LCPS has a severe shortage of staff who provide direct services that educate our students with disabilities and that shortage is directly leading to failures to educate our children. Now, that shortage is demoralizing and wearing out our teachers, who are leaving. SEAC is concerned that we must act to support our students and teachers and break this vicious cycle. Staff retention is a significant concern.

Instead of appropriately addressing this shortage, LCPS staff continue to propose cutting teachers and assistants while preserving indirect staff and even adding more supervisory positions.

SEAC is concerned about the priorities being demonstrated by the staff's proposal.

Concern 2: The Specialized Instructional Facilitator (SIF) staffing model does not meet the needs of our students or teachers.

In recent years, staff have created a number of positions (44.0FTE in the proposed budget) for “Specialized Instructional Facilitators” (SIFs) with different specialties. For example, SIFs for behavior (SIF-Bs) and SIFs for reading (SIF-Rs). These positions are based on a “teach the teacher” model. Teachers are expected to provide services directly to students, and SIFs provide teachers with advice and extra training if/as needed. As implemented in LCPS, parents are not given access to SIFs and SIFs are not normally part of the IEP process. This keeps parents in the dark about what resources and options are available within LCPS for their child.

SEAC has received numerous reports that teachers are stretched too thin and need help, not more work put on their overflowing plates. When there is a crisis for a student failing to learn or with behavioral outbursts, an expert needs to come into the classroom and provide direct emergency services to that student. The teacher can learn from observing what is happening in the classroom and the SIF can hand the reins over to the teacher once the “bugs” have been worked out of the solution. The SIF model cannot work when the root cause of the problem is lack of special education teachers and assistants and lack of specialized staff to provide direct services to students.

For example, if a student needs assistive technology (AT), instead of the SIF-AT teaching the student how to use it, they teach the teacher how to teach the student to use it. A more efficient model would be to teach the student and teacher at the same time. That way, the student learns from the expert and the teacher learns how the student will use the AT in the classroom. The teacher does not have to become the expert in AT. In addition, parents often need training on the AT as well. This additional burden should not be placed on the special education teachers. Parents should be trained by the experts in the district.

SEAC has also received numerous reports that LCPS culture discourages seeking out the help of SIFs and instead pressures teachers to “figure it out for themselves”. SEAC has received reports that teachers must first go through their “consulting teacher” (another indirect staffing model of concern), to solve the problem increasing the time it takes for a direct and effective solution to reach the student in need.

SEAC has received reports that the SIFs vary significantly in their level of actual expertise as well as their approach in working with students and teachers. Some of the SIFs have been praised for approaching their role as genuinely trying to collaborate and assist teachers. Other SIFs have been criticized for walking into a teacher’s classroom, telling them all of the ways they are wrong, telling them how to do their job, and then leaving – and if outcomes aren’t improved, having plenty of ways to blame the teacher for getting it wrong. It should be no surprise that teachers are reluctant to expend significant time and effort to bring in such “help” from admin.

SEAC has received numerous reports that several of our SIFs work in dual roles in practice: the SIF role, where they coach teachers in individual cases, and in a specialist role where they design solutions and curriculum materials to share throughout LCPS. SEAC has received positive feedback about some of this solution and curriculum work.

This concern directly responds to the staff’s proposed major work plan initiative 5: “Continue to coach school-based teams to ensure the continuum of special education services is available for all students with disabilities by expanding knowledge and skills to administrators, teachers and related service providers,”

SEAC disagrees that this model of merely coaching is sufficient. Teachers and schools need access to experienced staff to provide direct services to students, not more people from admin adding to their classroom responsibilities.

Concern 3: The proposed budget does not provide sufficient supports for mental health, especially behavior.

SEAC has received numerous reports that there is a dramatic increase in mental health concerns impacting all students (not just SPED students). SEAC has also received numerous reports that behavior incidents (esp. those disrupting the learning of a student and/or others) have significantly increased at this point in the school year compared to previous in-person years.

SEAC has also received numerous reports that exclusionary disciplinary measures (e.g. suspension) have also significantly increased. Research shows that these measures directly harm students' and schools' educational outcomes. An increase in the use of these measures reverses trends of trying to decrease these disproportionalities within LCPS and is directly counter to years of effort on the part of the board and staff.

SEAC is concerned that we are regressing quickly due to a lack of sufficient supports for all of our students and teachers.

SEAC have repeatedly advised the board that we should be practicing a model of prevention and support, rather than responding to problems after they become visible. It does not appear that this is happening in our schools.

The school board has repeatedly stated that mental health is a high priority. Staff propose to create a new senior management position (Director of Student Mental Health). Curiously, the staff's proposed budget does not create a department page or staff for that person to manage. To truly change these disturbing trends, SEAC believes more Licensed Behavior Analysts need to be providing direct services to all LCPS students.

This concern directly responds to the staff's proposed major work plan initiative, "The Office of Special Education will collaborate with the Office of School Administration and Director of Equity to reduce the rate of suspensions and reduce discipline disproportionality of students with disabilities and students of color with disabilities."

SEAC disagrees that collaboration to change or reduce disciplinary responses is sufficient to address the needs of students with disabilities. Actual support must be provided that prevents behavior incidents from happening in the first place.

Concern 4: The proposed budget does not provide staffing necessary to implement meaningful inclusion goals.

SEAC continues to receive numerous reports that students with disabilities remain discriminated against, excluded, and/or otherwise denied opportunities to participate in our school communities. The current school board has repeatedly stated their support for creating an environment that welcomes all students and gives all students equal opportunities.

SEAC has received numerous reports that staff do not correctly account for disabled students' time in general education settings. SEAC has received reports of students who are administratively assigned to a general education setting for a certain amount of time, but that are walked to a general education classroom for a few minutes and then removed from that classroom. SEAC has received reports of students physically seated in a general education classroom, working 1:1 with a special education teacher and in no way participating with the other instruction or peers. SEAC has received reports of students who are routinely excluded from their assigned general education setting due to behavior incidents or as an undocumented change to the educational program. In these cases, it is SEAC's understanding that LCPS staff continues to account for the students' time in the general education classroom based on their theoretical assignment and not based on whether the student is actually in the general education setting. These reports cast significant doubts on the staff's inclusion claims.

SEAC is concerned that mere "inclusion" of a student's body in the classroom is sufficient to be called "inclusion". SEAC supports meaningful inclusion in which all students are meaningfully educated and meaningfully participate in general education classes with diverse peers. Instead of being educated and treated as peers, disabled students are often being excluded in place.

SEAC has received numerous reports that teachers are stretched too thin and need help. We believe that most of our teachers do not intend to discriminate against disabled students, but also that most of our teachers have limited knowledge and expertise in how to meaningfully include students with disabilities.

SEAC is concerned that the school board and staff talk about the importance of inclusion, but that the team-taught model is not working consistently across the district and at all grade levels. SEAC has received numerous reports that special education teachers in team-taught classes are not modifying curriculum, not providing accessible materials, and not ensuring accommodations are being implemented and consistently followed in the classroom. This is particularly evident in the middle and high schools.

This concern is responsive to staff's FY23 initiatives 2 ("Implement effective inclusive practices to increase the participation of children with disabilities in the general education environment where at least 70% of students will spend at least 80% of their day in the general education setting.") and 9 ("Continue to develop the Inclusive Design website [url removed] that was launched to share resources to support families, educators, and learners in how to use technology to support learning.").

SEAC is concerned with how LCPS defines and documents "inclusion" and that the team-taught model is not achieving these stated initiatives in a systemic way. If we are serious about inclusion, we need to provide teachers and assistants help in the form of ready to implement tools and solutions. The Inclusive Design website is an example of a promising system-wide resource.

2. Recommendations

Recommendation 1: Reallocate (15.0FTE) SIF-B from the Special Education budget to 19.0FTE Licensed Behavior Analyst (LBA) under the Director of Student Mental Health.

For many years, SEAC and many other community groups have expressed concern to the school board that disabled and minority students are subjected to exclusionary disciplinary measures at a disproportionate rate. The staff have implemented many behavior initiatives intended to decrease these disproportionalities. However, SEAC has repeatedly expressed concern that these efforts are disproportionately focused on behavior responses instead of prevention. For many years, SEAC and other community groups have advised the school board and staff that reduction of disciplinary disproportionalities should be achieved through a proactive model of supporting students using evidence-based practices. LCPS staff hired people with the right credentials but put them in roles that prevent them from actually doing that.

For many years, SEAC has called for the school board to hire Licensed Behavior Analysts (LBAs; note that LBAs are licensed BCBAs) to provide evidence-based behavior support for students with behavioral needs. In response to the restraint and seclusion scandal, staff proposed to the Ad Hoc Committee on Special Education to create 11.0FTE SIF-B positions, to be filled with LBAs. One of the SEAC members on the committee asked that this recommendation be changed to LBAs. The former Director of Special Education opposed this change on the grounds that she would have to write a new job description and did not wish to do that work. The SEAC and community members of the committee supported the recommendation on the understanding that we were going to hire LBAs and that this was merely an administrative issue.

SEAC has received numerous reports that, as a direct result of the SIF-B job title and service model, the LBAs that LCPS hired are not working directly with students. ABA is not ethically or effectively practiced by having a BCBA design a program, spend a few days with a teacher training them, and then leaving. That is exactly what LCPS does, and SEAC has received numerous reports that it is often not working well.

SEAC and the school board have received significant community and staff feedback that additional mental health supports are necessary. Multiple school board members have publicly commented that this is a priority.

SEAC has received numerous reports that there is a dramatic increase in mental health concerns impacting all students (not just SPED students). SEAC has also received numerous reports that behavior incidents (esp. those disrupting the learning of a student and/or others) have significantly increased at this point in the school year compared to previous in-person years.

Functional Behavior Assessments (FBAs) and Behavior Implementation Plans (BIPs) are behavioral support tools available for use with all students. Although many students with BIPs are also SPED students, these supports should be available to support the behavioral health of all students who need it. Also, if a student's behavior interferes with the learning of themselves or others, LCPS must not delay provision of behavioral health support during the SPED eligibility and initial IEP process (which can take months).

Staff's proposed budget creates a position, Director of Mental Health, but does not create a department or budget book page for this person to manage. SEAC recommends that the school board use budget reallocation to remove two key restrictions on our behavioral health supports. First, by reallocating the existing SIF-Bs to explicit LBA titles, we ensure that we are hiring qualified staff and giving them the role and scope to practice ABA ethically and directly in support of our students and classrooms. Second, by reallocating these positions from the SPED department to the newly created mental health department, we are making this resource available for all students with behavioral health needs.

SEAC recommends that these positions initially be staffed at a strength of 19.0FTE on the staffing standard of 1.0FTE per high school cluster (of which there are 18), with an additional 1.0FTE to support alternative and specialized schools and out-of-system placements.

This recommendation is responsive to SEAC concerns 1-4.

SEAC recommends that our existing LBAs be moved from a “coaching” role to directly working with students and teachers to improve behavior outcomes (concerns 1 and 2).

SEAC recommends that we rethink the roles of our LBAs to be behavioral and mental health resources, available to all based on need rather than label (concerns 3).

SEAC recommends that we proactively support and address the behavioral problems that often lead to SPED students being assigned to more restrictive environments and/or not meaningfully participating in general education settings (concern 4).

This recommendation is responsive to staff's FY23 initiatives 1 (“The Office of Special Education will collaborate with the Office of School Administration and Director of Equity to reduce the rate of suspensions and reduce discipline disproportionality of students with disabilities and students of color with disabilities”) and 2 (“Implement effective inclusive practices to increase the participation of children with disabilities in the general education environment where at least 70% of students will spend at least 80% of their day in the general education setting.”)

Recommendation 2: Reallocate (5.0FTE) SIFs from the Special Education budget to 5.0FTE Specialist: Inclusive Instructional Designer.

SEAC continues to receive numerous reports that students with disabilities remain discriminated against, excluded, and/or otherwise denied opportunities to participate in our school communities. The current school board has repeatedly stated their support for creating an environment that welcomes all students and gives all students equal opportunities.

SEAC has received numerous reports that teachers are stretched too thin and need help. We believe that most of our teachers do not intend to discriminate against disabled students, but also that most of our teachers have limited knowledge and expertise in how to meaningfully include students with disabilities.

SEAC recommends that the school board create Specialist positions directly tasked with providing teachers and school-based staff with training and easy to use resources to achieve meaningful inclusion.

This recommendation is responsive to SEAC's concerns 2 and 4.

SEAC recommends that meaningful inclusion is an important goal that needs to be explicitly staffed, and that we should support our teachers and school-based staff by giving them training and ready to implement tools and solutions. The Inclusive Design website is an example of a promising system-wide resource.

This recommendation is responsive to staff's FY23 initiatives 2 ("Implement effective inclusive practices to increase the participation of children with disabilities in the general education environment where at least 70% of students will spend at least 80% of their day in the general education setting.") and 9 ("Continue to develop the Inclusive Design website [url removed] that was launched to share resources to support families, educators, and learners in how to use technology to support learning.").

Future Work: SEAC, the school board, and staff need to review the staff positions and structure and realign them to meet our strategic goals. (Responsive to all)

SEAC is concerned that there appear to be significant structural inefficiencies, ineffective approaches, and misalignment between the SPED department's stated goals and its budgeted positions.

SEAC is also concerned that there are many areas of the LCPS budget and organization where it is an outlier compared to neighboring school systems, allocating significant number of FTEs to positions and approaches that appear to be less efficient and effective compared with neighboring school systems.

SEAC understands that the school board is currently in the process of reviewing its strategic goals. At or near the completion of this process, SEAC recommends that all stakeholders collaborate on a review of staff positions and structure – not limited to SPED – and what changes should be made to realign them to best meet our strategic goals.